

*BB***JULY 28, 2008**
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**RECEIVED**

JUN 20 2008

*Jun 20 2008*MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MS. VICTORIA JONES
P.O. BOX 2658
COUNTRY CLUB HILLS, IL. 60478
(Name of the plaintiff or plaintiffs)

v.
BREMEN HIGH SCHOOL DISTRICT 228
15203 S. PULASKI
MIDLOTHIAN, IL. 60445
(Name of the defendant or defendants)

CIVIL ACTION

08CV3548
JUDGE MANNING
MAG. JUDGE KEYS**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.
2. The plaintiff is VICTORIA JONES of the county of COOK in the state of ILLINOIS.
3. The defendant is BREMEN HIGH SCHOOL DISTRICT 228, whose street address is 15203 S. PULASKI, (city) MIDLOTHIAN, (county) COOK, (state) ILLINOIS, (ZIP) 60445. (Defendant's telephone number) (708) - 389-1175.
4. The plaintiff sought employment or was employed by the defendant at (street address) 15203 SOUTH PULASKI, (city) MIDLOTHIAN, (county) COOK, (state) ILLINOIS, (ZIP code) 60445.

5. The plaintiff [check one box]
(a) was denied employment by the defendant.
(b) was hired and is still employed by the defendant.
(c) was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) DECEMBER, (day) 01, (year) 2005.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

(a) The defendant is not a federal governmental agency, and the plaintiff [check one box] has not has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) the United States Equal Employment Opportunity Commission, on or about (month) OCTOBER (day) 05 (year) 2007
- (ii) the Illinois Department of Human Rights, on or about (month) NOVEMBER (day) 29 (year) 2007

(b) If charges *were* filed with an agency indicated above, a copy of the charge is

attached. YES. NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

- Yes (month) _____ (day) _____ (year) _____
- No, did not file Complaint of Employment Discrimination

2. The plaintiff received a Final Agency Decision on (month) APRIL (day) 10 (year) 2008.

c. Attached is a copy of the

a. Complaint of Employment Discrimination,

- YES NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

- YES NO, but a copy will be filed within 14 days.

8. (*Complete paragraph 8 only if defendant is not a federal governmental agency.*)

(a) the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b) the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) APRIL (day) 13 (year) 08 a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

- (a) Age (Age Discrimination Employment Act).
- (b) Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) Religion (Title VII of the Civil Rights Act of 1964)
- (g) Sex (Title VII of the Civil Rights Act of 1964)

10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).

11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.

12. The defendant [*check only those that apply*]

- (a) failed to hire the plaintiff.
- (b) terminated the plaintiff's employment.
- (c) failed to promote the plaintiff.

- (d) failed to reasonably accommodate the plaintiff's religion.
- (e) failed to reasonably accommodate the plaintiff's disabilities.
- (f) failed to stop harassment;
- (g) retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) other (specify): SUPPORTING DOCUMENTATION OF HARASSMENT

AND RETLIACTION ATTACHED

13. The facts supporting the plaintiff's claim of discrimination are as follows:

SUPPORTING DOCUMENTATION ATTACHED

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. YES NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
[check only those that apply]

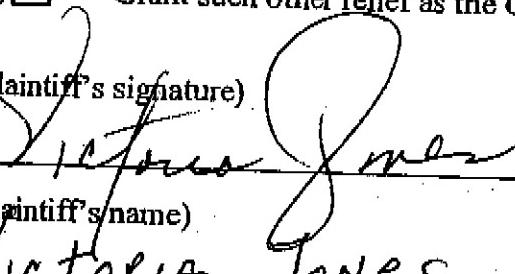
- (a) Direct the defendant to hire the plaintiff.
- (b) Direct the defendant to re-employ the plaintiff.
- (c) Direct the defendant to promote the plaintiff.
- (d) Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) Direct the defendant to reasonably accommodate the plaintiff's disabilities.

(f) Direct the defendant to (specify): _____

(g) If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)



(Plaintiff's name)

Victoria Jones

(Plaintiff's street address)

P.O. Box 2658

(City) COUNTRY CLUB HILL (State) ILLINOIS (ZIP) 60478

(Plaintiff's telephone number) (708) - 846-1777

Date: JUNE 20, 2008



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

CERTIFIED MAIL
5054 1064

950 Pennsylvania Avenue, N.W.
Karen Ferguson, EMP, PHE, Room 4219
Washington, DC 20530

Ms. Victoria Jones
P.O. Box 2658
Country Club Hills, IL 60478

April 10, 2008

Re: EEOC Charge Against Breman High School Dist. #228
No. 440200800161

Dear Ms. Jones:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title I of the Americans with Disabilities Act of 1990, 42 U.S.C. 12111, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice. If you cannot afford or are unable to retain an attorney to represent you, the Court may, at its discretion, assist you in obtaining an attorney. If you plan to ask the Court to help you find an attorney, you must make this request of the Court in the form and manner it requires. Your request to the Court should be made well before the end of the time period mentioned above. A request for representation does not relieve you of the obligation to file suit within this 90-day period.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Grace Chung Becker
Acting Assistant Attorney General
Civil Rights Division

by

Karen L. Ferguson

Karen L. Ferguson
Supervisory Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC
Breman High School Dist. #228

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

 FEPA
 EEOC

440-2008-00161

Illinois Department Of Human Rights

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Ms. Victoria Jones

Home Phone (Incl. Area Code)

(708) 846-1777

Date of Birth

11-29-1959

Street Address

City, State and ZIP Code

P O Box 2658, Country Club Hills, IL 60478

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

BREMAN HIGH SCHOOL DISTRICT 228

No. Employees, Members

Phone No. (Include Area Code)

500 or More

(708) 371-3600

Street Address

City, State and ZIP Code

15203 South Pulaski Road, Midlothian, IL 60445

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

12-01-2005

10-05-2007

 CONTINUING ACTION**THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):**

I have been employed by Respondent since May 1984 as a Secretary. Beginning in or about December 2005, and continuing, I have been subjected to harassment which has created a hostile work environment.

I believe that I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended.

RECEIVED EEOC

OCT 05 2007

CHICAGO DISTRICT OFC

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

Oct 05, 2007

Charging Party Signature

SUBSCRIBED AND SWEORN TO BEFORE ME THIS DATE
 (month, day, year)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

 FEPA
 EEOC

AMENDED
440-2008-00161
Illinois Department Of Human Rights

and EEOC

Name (Indicate Mr., Ms., Mrs.)

Ms. Victoria Jones

Home Phone (Incl. Area Code)

(708) 846-1777

Date of Birth

11-29-1959

Street Address

City, State and ZIP Code

P O Box 2658, Country Club Hills, IL 60478

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

BREMAN HIGH SCHOOL DISTRICT 228

No. Employees, Members

Phone No. (Include Area Code)

500 or More**(708) 371-3600**

Street Address

City, State and ZIP Code

15203 South Pulaski Road, Midlothian, IL 60445

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

<input checked="" type="checkbox"/> RACE	<input type="checkbox"/> COLOR	<input type="checkbox"/> SEX	<input type="checkbox"/> RELIGION	<input type="checkbox"/> NATIONAL ORIGIN
<input type="checkbox"/> RETALIATION	<input type="checkbox"/> AGE	<input checked="" type="checkbox"/> DISABILITY	<input type="checkbox"/> OTHER (Specify below.)	

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

12-01-2005 10-05-2007
 CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s);

I have been employed by Respondent since May 1984 as a Secretary. Respondent has been aware of my disability. Beginning in or about December 2005, and continuing, I have been subjected to harassment which has created a hostile work environment.

I believe that I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended. I also believe I have been discriminated against because of my disability, in violation of the Americans with Disabilities Act of 1990.

RECEIVED EEOC

DEC 21 2007

CHICAGO DISTRICT OFFICE

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

X/2/20/07 X *Victoria Jones*
 Date Charging Party Signature

SUBSCRIBED AND SWEARN TO BEFORE ME THIS DATE
(month, day, year)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

#08W1128-16

AGENCY IDHR EEOC**CHARGE NUMBER**

2008CF1357

Illinois Department of Human Rights and EEOC**NAME (indicate Mr., Ms., Mrs.)**

Ms. Victoria Jones

HOME TELEPHONE (include area code)

(708) 846-1777

STREET ADDRESS

P.O. Box 2658

CITY, STATE AND ZIP CODE

Country Club Hills, Illinois 60478

DATE OF BIRTH

11/29/59

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)

NAME

School District #228 - Bremen

NUMBER OF EMPLOYEES,

MEMBERS 15+

TELEPHONE (Include area code)

(708) 389-1175

STREET ADDRESS

15203 S Pulaski Road

CITY, STATE AND ZIP CODE

Midlothian, Illinois 60478

COUNTY

Cook (031)

CAUSE OF DISCRIMINATION BASED ON:

Race

Mental Disability

Retaliation

DATE OF DISCRIMINATION

EARLIEST (ADEA/EPA) LATEST (ALL)

10/06/07

 CONTINUING ACTION

THE PARTICULARS ARE (if additional space is needed attach extra sheets)

I. A. ISSUE/BASIS

HARASSMENT, BEGINNING ON /OR ABOUT OCTOBER 6, 2007 AND CONTINUING THROUGH OCTOBER 16, 2007, BECAUSE OF MY RACE, BLACK.

B. PRIMA FACIE ALLEGATIONS

1. My race is black.
2. I have satisfactorily performed my duties as a Secretary in Respondent's P.P.S Department, and have been employed with Respondent since June, 1984.

(Continued)

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE

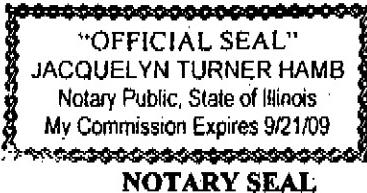
ME THIS 29 DAY OF November, 2007

NOTARY SIGNATURE

X Jacquelyn Turner Hamb SIGNATURE OF COMPLAINANT

11/29/07 DATE

I declare under penalty of perjury that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief



CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY
 FEPA
 EEOC

CHARGE NUMBER

1994CF0988

STATE OF ILLINOIS DEPARTMENT OF HUMAN RIGHTS/Intake and EEOC
State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Victoria Jones

HOME TELEPHONE (Include Area Code)
708-371-0393

STREET ADDRESS

3207 Emory Lane

CITY, STATE AND ZIP CODE

Robbins, IL 60472

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME DISTRICT 228 BREMEN TOWNSHIP
Board of Education

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)
708-371-3600

STREET ADDRESS

15203 S. Pulaski

CITY, STATE AND ZIP CODE

Midlothian, IL 60445

COUNTY
COOK

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE
EARLIEST LATEST

9/9/93

 CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

On September 9, 1993, I was denied promotion to the position of secretary to the Director of Facilities and Services. I was hired on June 5, 1984 and currently function as dean secretary.

- I. According to Richard Linden (white), Director of Facilities and services, I was denied the position because it was given to someone who is more qualified than I am.
- II. I believe I have been discriminated against because of my race, black, in that:

 - I am a good and conscientious employee.
 - The individual who was promoted to that position, Kathy McAteer (white), is not as qualified or experienced as I am. In fact I have played a significant role in the process of training her since she has been employed at Respondent.

CAH/kir

I want this charge filed with both the EEOC and the state or local agency. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

I swear / affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE

10/12/93

"OFFICIAL SEAL"

Krystal L. Rogers

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

NOTARY PUBLIC SEAL

NOTARY PUBLIC, State of Illinois
My Commission Expires Nov. 7, 1994

NOTARY PUBLIC'S (Rev. 08/82)

www.GoldmanEhrlich.com

-----Original Message-----

From: RICHARD MITCHELL [mailto:rmit404@sbcglobal.net]
Sent: Tuesday, March 11, 2008 1:20 PM
To: Arthur Ehrlich
Subject: Re: Victoria Jones/Bremen

I'm in Puebla, Mexico, so we'd have to search for a beach! ;)

I think if you look across the district and who is in charge administratively you can see a distinct pattern of promoting whites into positions of power, and then using them to beat up on minorities whenever possible. It's so pervasive that I don't know where to begin to help you, Art. Otis Lane, black dean at Bremen, complained to me early on that he was the victim of racial discrimination at Bremen. He might be a good person to connect with. He was passed over for a principal position at Hillcrest this past year. He also indicated that black kids were discriminated against at Bremen. Whether or not you'd get any help out of him now or not, I don't know. The district has a way of "quieting" people who make noise. But just look at who is in charge of the buildings....with the exception of Hillcrest....they're all white. Bremen doesn't have a single black administrator (except for the one dean, which isn't a full admin position)--or Hispanic, for that matter, which would make more sense since its largest minority is now hispanic. Cynthia Walker was on the board for years and she constantly indicated that racial discrimination was a problem for her and her kids while attending Hillcrest and Tinley Park. Again, I don't know if she'd be willing to assist you. She's no longer on the board. I was just deposed in December by the parent of a black student at Oak Forest who alleged racial discrimination...Chori Bryant. I, of course, allege I was released because I'm gay...which we're in the middle of now. Another psychologist at Bremen, who is lesbian, was placed on permanent leave after being harassed for a full year or more by the administration at Bremen. Her name is Betsy Molnar. There is definitely a problem at Bremen, and it is mostly due to a southside mentality of discrimination. I put a sign up on the marquis when I first got back to the district saying, in Spanish, "Welcome back to School." A board member called me to take it down immediately. That's what you're up against.

If I think of other specific things, I'll let you know. I've been trying to forget 228.

Good luck...Rich

Previous
Superintendent
2006-07
School year

----- Original Message -----

From: Arthur Ehrlich <Arthur@goldmanehrlich.com>
To: RICHARD MITCHELL <rmit404@sbcglobal.net>
Sent: Tuesday, March 11, 2008 12:51:40 PM
Subject: RE: Victoria Jones/Bremen

Wish I could be there in person in Mexico to ask questions as we chat by the beach.

Anyway, as you may know, Ms. Jones is alleging race discrimination in the way she has been picked on, singled out, and held to higher standards. She has told me that as the prior Superintendent, you may have some knowledge of a pattern of racial discrimination in the Deans' office where she worked. If so, any information you have on this may help. It could be your knowledge of complaints of discrimination against the same Deans in Ms. Jones' office made by other black employees or even by parents or students who have felt they were treated differently than white students.

You may have witnessed or heard of how these deans have treated other black employees/students differently. Anything along these lines would be helpful.

Ms. Jones can identify the key personnel causing her problems.

Thanks for your help

Arthur R Ehrlich
Goldman and Ehrlich
19 South La Salle Street
Suite 1500
Chicago, IL 60603
(312) 332-6733
(312) 332-4629 fax
Arthur@GoldmanEhrlich.com
www.GoldmanEhrlich.com

-----Original Message-----

From: RICHARD MITCHELL [mailto:rmit404@sbcglobal.net]
Sent: Tuesday, March 11, 2008 12:28 PM
To: Arthur Ehrlich
Subject: Victoria Jones/Bremen

Arthur--

I got an email from Vickie Jones asking me to contact you. My name is Rich Mitchell and I was the supt. at 228 for a short time, which is where I met Vickie. If I can be of help to you, this is the best way to communicate, as I'm spending time in Mexico until May. Look forward to hearing from you.

Rich Mitchell

Previous Superintendent /06-07
School Dist 228 year

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Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.



Fw: Re: FW: Victoria Jones/Bremen

Tuesday, June 10, 2008 8:35 PM

From: "victoria jones" <simone_60478@yahoo.com>
To: simone_60478@yahoo.com

-- On Tue, 6/10/08, victoria jones <simone_60478@yahoo.com> wrote:

From: victoria jones <simone_60478@yahoo.com>
Subject: Fw: Re: FW: Victoria Jones/Bremen
To: simone_60478@yahoo.com
Date: Tuesday, June 10, 2008, 8:33 PM

-- On Sat, 4/26/08, victoria jones <simone_60478@yahoo.com> wrote:

From: victoria jones <simone_60478@yahoo.com>
Subject: Fw: Re: FW: Victoria Jones/Bremen
To: simone_60478@yahoo.com
Date: Saturday, April 26, 2008, 4:01 PM

-- On Tue, 3/11/08, victoria jones <simone_60478@yahoo.com> wrote:

From: victoria jones <simone_60478@yahoo.com>
Subject: Re: FW: Victoria Jones/Bremen
To: "Arthur Ehrlich" <Arthur@goldmanehrlich.com>
Date: Tuesday, March 11, 2008, 4:26 PM

Otis Lane is the 3rd Dean at Bremen who I worked with the longest, he gave me my 06/07 evaluation. I will call him after he get out of work, but He is one of the Dean in that office and he sees what is going on to. I will e-mail you soon with more infor.

Thank so much
Ms. Jones

Arthur Ehrlich <Arthur@goldmanehrlich.com> wrote:

This is the response I got from Dr Mitchell. I was wondering if you had anything to add, including if Otis Lane might be of help

Arthur R Ehrlich
Goldman and Ehrlich
19 South La Salle Street
Suite 1500
Chicago, IL 60603
(312) 332-6733
(312) 332-4629 fax
Arthur@GoldmanEhrlich.com

The End
↓

Victoria Jones

From: Victoria Jones
Sent: Thursday, September 27, 2007 9:02 AM
To: Dave Kibekis
Cc: Edwin Lipowski; Vicki Intoe; Victoria Jones
Subject: Concern 3
Attachments: Concerns.doc

Dear Dr. Kibekis

Attached you will find a letter that I submitted to Dr. Mendenhall, as a result, I met with Dr. Mendenhall and Ms. Jurgens regarding Ms. Jurgens actions toward me. However this meeting did not cause Ms. Jurgens to stop harassing me.

There have been four or five meetings with Mr. Lipowski relative to Ms. Jurgens action toward me. During one of those meetings, Ms. Jurgens admitted acting inappropriately toward me in front of Parents and students. These actions by Ms. Jurgens have created a hostile work environment and continue to cause me work related stress.

I am appealing to you to intervene in this situation.

Thanks
Ms. Jones

Marcia Mendenhall

From: Michele Jurgens
Sent: Tuesday, April 04, 2006 8:45 AM
To: Marcia Mendenhall
Subject: FW: Concerns

-----Original Message-----

From: Victoria Jones
Sent: Friday, March 24, 2006 9:57 AM
To: Marcia Mendenhall
Cc: Phyllis A. Kimmel; Otis Lane; Vince Kasley; Michele Jurgens
Subject: Concerns

Dear Dr. Mendenhall,

I have been a discipline secretary for over 20 years, I have been assigned more jobs than any discipline secretary in the district, I handled bus routes, assigned appropriate busses for students, lockers, as well as putting this information in the computer, for students I.D.s, I process all Dean Referrals, Detentions, M.D.P. S. Suspension, Saturday Detention, As well as filing all these forms in the students file, mailing parents informing them of this disposition. Send trespassing letter, Home coming request forms???? Parking applications, Record Monthly & Yearly suspension report. I answer the telephone for all the deans, bus complaints, theft, locker complaints, etc.... greet visitor entering the P.P.S. office as well as supervised any students who need to be discipline.

I must deal with them if they are rude or cordial and frequently calm them to restore a business like atmosphere in the office, I have done all of the above described with a smile and without complaint or permission. I have given up my morning break to accomplish tasks in the office. When the attendance secretary is away, I adapt to this situation and complete her job.

Now it seems to me that I don't get any complaint from Students, Teachers, Administration, Past Administration, as well as Parents, who praise me for my service to them. My job is done on time as well as my reports, at what point did my recognition diminish, because all I been getting is complaint from Ms. Jurgens.

In an effort to understand what is going on the P.P.S. office I believe that over the past 20 years as the Deans secretary I have not heard that many complaints from Parents, Students, Administration, Past and Present as to a lack of my response to them ,I received a number of commendations for my service from them known and unknown to many who praise me for what I do, However lately I believe my recognition from some have diminish and the complaints by Ms. Jurgens have been numerous and leads me to believe that they are of a personal nature based on a mutual respect for what do. Over the past I have respected the Deans and protected the Deans from a lot of unnecessary things that occur in the office, that prevent them from having to deal with it, Dr Mendenhall this

current situation has cause me just as must stress as it has cause everyone else. I need some answers.

Thanks

Victoria Jones

Bremen High School

Deans Assistant

ext. 2208

Arthur Ehrlich, Attorney at Law
19 South LaSalle Street
15th Floor
Chicago, IL 60603

March 19, 2008

I was employed with Bremen High School District 228 from August 2005 until May 2007 as the Pupil Personnel Services Coordinator at Bremen High School. In that capacity, my responsibilities included the overall coordination and supervision of the daily functions of the pupil personnel services department which included discipline, guidance and counseling and ancillary services.

While serving in this capacity, Ms. Michele Jurgens, a dean, made numerous complaints about the performance of Ms. Victoria Jones, a clerical worker. Ms. Jones also serves as the Dean's Secretary. Numerous meetings were held with both of them to resolve the issues. Ms. Michele Jurgens continued to send numerous e-mails to me about Ms. Jones's performance through the end of the last school year of which I served at Bremen High School.

I witnessed Ms. Jurgens slam a handful of papers down on the counter in front of Ms. Jones's desk on one occasion. I was standing in the doorway of my office at this time. Ms. Jurgens may not have been aware that I had witnessed this incident. I brought this to the attention of my supervisor, Dr. Mendenhall. To my knowledge, she did not respond to this.

I met with Ms. Jones and Ms. Jurgens when Ms. Jurgens made complaints to try to resolve the issues. In my opinion, the issues were resolved through compromise, although Ms. Jurgens continued to e-mail complaints about Ms. Jones's performance to me. These incidents of the e-mails and the paper slamming created a hostile working environment. I tried to do as much as I could given the limits placed upon me by meeting with the two employees each time a complaint was made.

Please feel free to contact me should you need additional information. You may contact me at 815-531-4245.

Sincerely,



Phyllis A. Kimmel

May 16, 2007
2:33 pm

I was standing at the desk of Karen Edwards, attendance secretary, waiting for another secretary to return to the P.P.S. office to begin a meeting. Mr. Paul Rybarczyk, associate principal, approached me and asked if he could speak with me in my office, but before I could take a step toward my office, he rudely said to Ms. Edwards, "Is that all you can do is read a magazine? You can't even take a message from a parent?" He then looked over toward Victoria Jones and said, "Can't you take a message, either?" At that point, I said, "Let's go back to my office and discuss this." Karen asked him, "What are you talking about? I am on my break." He then turned and exited the P.P.S. office area. There were students present when this incident occurred.

Phyllis Kimmel
Pupil Personnel Service Coordinator
Bremen High School
2005 - 2006
2006 - 2007
School Years

Karen Edward Statement

Co-Worker

On May 16, 2007 Around 8:15/2:30pm,
Mr. Paul Kybarczyk, Associate
Principal at Breckin A.S. stormed
into the P.P.S office asking for
Phyllis Kimmel, PPS Director.
He stood by my desk (Ms. Edwards).
I was taking my break and
looking through a catalog
while waiting for our secretary's
meeting w/ Ms. Kimmel to begin.
Mr. Kybarczyk looked at me and
stated: "That's all you can do
all day is sit there & read a
magazine" I was totally surprised
and looked up at him and said
"pardon me?" He repeated: "Is that
all you can do all day is sit
there and read a magazine but
you can't take a message from
a parent". I asked him what
was he talking about because I
had no idea what was going on.
He would not specify what he was
referring to but kept ranting
raving in front of several students.

(2)

Karen Edwards Statement - Co-Worker
that were in the office and
parents also who were there
at the time. & co-~~workers~~ workers
Our PPS Directors tried to
calm him down but he wouldn't
stop. He then waved his hand
at Ms. Jones and said "And
her over there can't do anything
either." Ms. Kimmel finally
got him to go into her office.
It was very humiliating and
embarrassing.

Ms. Edwards
Attendance Secretary

Karen Edward Statement
Co-worker

On Friday 10/12/07 around about 2:30/2:40 pm Mr. Lipawski, TPS Director went over to Ms. Jones, Dean's Assistant's desk and asked her why she did not have the Bus report that was given to her on Wednesday 10/10/07 finished. She began ~~to~~ to explain why. He then wanted her to show him how long it takes to run the report & then he wanted her to show him what it is that she does all day. He began to get loud & confrontational to the point where I wanted to ask him if he would take that discussion into his office.

Ms Edwards
Attendance Secretary



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James A. Sylva, M.D.

EXECUTIVE OFFICER

David G. Seaman

January 30, 2008

RE: Victoria Jones

901760100

DOB: 11/29/1959

To Whom It May Concern:

Victoria Jones is a 48-year-old African-American female who has been seeing me since after 8/2007, very stressed at work, high blood pressure at work. Also complaining of right hand numbness and tingling sensation. She has been on the computer for many years. In between the patient was also admitted to the hospital for anxiety and palpitation and uncontrolled hypertension. At the present time she is undergoing treatment. She is on multiple medications, DynaCirc for the blood pressure, Ambien for the sleep, Synthroid, and Ativan. She is also going through the carpal tunnel syndrome treatment and physical therapy at the PTSIR rehabilitation.

Patient has been off work since 10/15/07. Her hypertension, anxiety and the carpal tunnel are caused from the work situation.

Sincerely,


Ashok Dhotakia, MD/sdp

D: 01/30/08

T: 01/31/08

J: 2009



The Center for Neurobehavioral Services, S.C.

Neuropsychology Division
14400 S. John Humphrey Drive, Suite 101
Orland Park, IL 60462

Phone: 708-226-1360
Fax: 708-226-1657

January 11, 2008

RE: Victoria Jones

To Whom It May Concern:

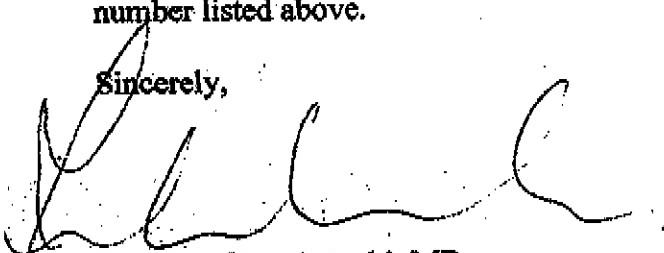
The above named patient Victoria Jones is currently under my care. She has been diagnosed with Major Depressive Disorder, Recurrent 296.3X, Panic Disorder w/o Agoraphobia 300.01.

Mrs. Jones is currently undergoing treatment including medication management and is taking Remeron 30mg one tab qhs, Ambien CR 12.5mg one tab qhs as needed and began Ativan 1mg at bed time.

In my clinical opinion problems at work contributed to her current mental condition.

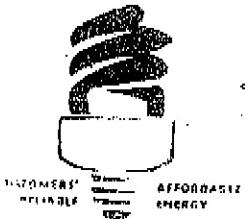
If you have further questions or concerns please do not hesitate to contact my office at the number listed above.

Sincerely,



Jaroslaw Czarnkowski, MD
General Psychiatry
Psychosomatic Medicine

JC/ew



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Residential Special Hardship Fund

Funding Agency:	<i>Southwest CEDU</i>			Contact Person:	<i>Wendy Hewitt</i>		
Agency Address:	<i>3518 W. 139th St.</i>			Phone #	<i>1-708-371-1543</i>		
Customer Name:	<i>Victoria Jones</i>			Fax #	<i>1-708-371-1247</i>		
Address:	<i>3848 LIVING ST.</i>						
City:	<i>Robbins</i>	State:	<i>IL</i>	Zip:	<i>60473</i>	Home Phone	<i>708-676-1777</i>
Account Number:	<i>0110123095</i>			Account Number:			
Amount Requested?	<i>C.O.R. has a medical condition.</i>						

I release the following information to ComEd and The Illinois Community Action Association (ICAA), its Agents or its Agents. My consent allows personal account information to be shared with ComEd and ICAA for the purpose of providing service for my utility service. Note: The program will be terminated once funds are exhausted or rate freeze legislation has passed. Submission of an application does not guarantee the applicant will get a grant. ComEd reserves the right to deny an application for reason without notice. One application per household.

Signature:	<i>Wendy Hewitt</i>		Date:	<i>5/16/08</i>	
Ref Client:	<i>Victoria Jones</i>		Date:	<i>5/16/08</i>	

FOR COMPANY USE DO NOT WRITE BELOW THIS LINE

Approved?		YES	DENIAL REASON:	Credit Amount:
		NO		



208 S. LaSalle Street, Suite 2010 • Chicago, Illinois 60604-1001

COOK COUNTY: _____

INTAKE SITE: Oral

APPLICATION DATE: 4/16/09

ZERO INCOME AFFIDAVIT

Victoria Jones (Applicant Name) residing at

(Applicant Name)

3242 Keweenaw Rd. 11/11/03-11/12/03 attest to the fact that adult members
of my household have received zero income for the period covering 11/11/03 to 11/12/03.

Name of adult members with Zero Income:

Victoria Jones referred to M45

EXPENSE	AMOUNT
Rent	\$ 700.00
Food	\$ 400.00
Heat	\$ 100.00
Electricity	\$ 59.00
Water	\$
Transportation	\$
Loans	\$
Miscellaneous	\$
TOTAL	\$1259.00

last date of employment/ending date of income source: 10/27

Date of last paycheck/income received: 10/27

Our family has met the above financial obligations during the reporting period by:

1

Victor J. Uffman

from

of course/ telephone

(Address)

I understand that to perjure myself in order to obtain assistance is a fraudulent offense for which I can be prosecuted.

Japan

~~4-116-08~~

Plate

331.54.3054

Social Security

Date _____

July 21, 1959

Witnessed By